



# Supplement Not Supplant

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***Supporting Schools and Students to Achieve***

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# Supplement Not Supplant (1)



- Under ESSA's Supplement not Supplant (SNS) requirements, a local educational agency (LEA) may use Title I-A funds only to supplement the funds that would, in the absence of those Title I-A funds, be made available from state and local sources for the education of students participating in Title I-A programs, and not to supplant such funds.
- LEA cannot use federal program funds to supplant funds from non-federal sources.

# Supplement Not Supplant (2)



- LEAs must demonstrate that the methodology used to allocate state and local funds to each school receiving Title I-A funds ensures that each school receives all of the state and local funds it would otherwise receive if it were not receiving Title I-A funds.

# Supplement Not Supplant - Resources



## U.S. Department of Education SNS Manual

- <https://www2.ed.gov/policy/elsec/leg/essa/snsfinalguidance06192019.pdf>

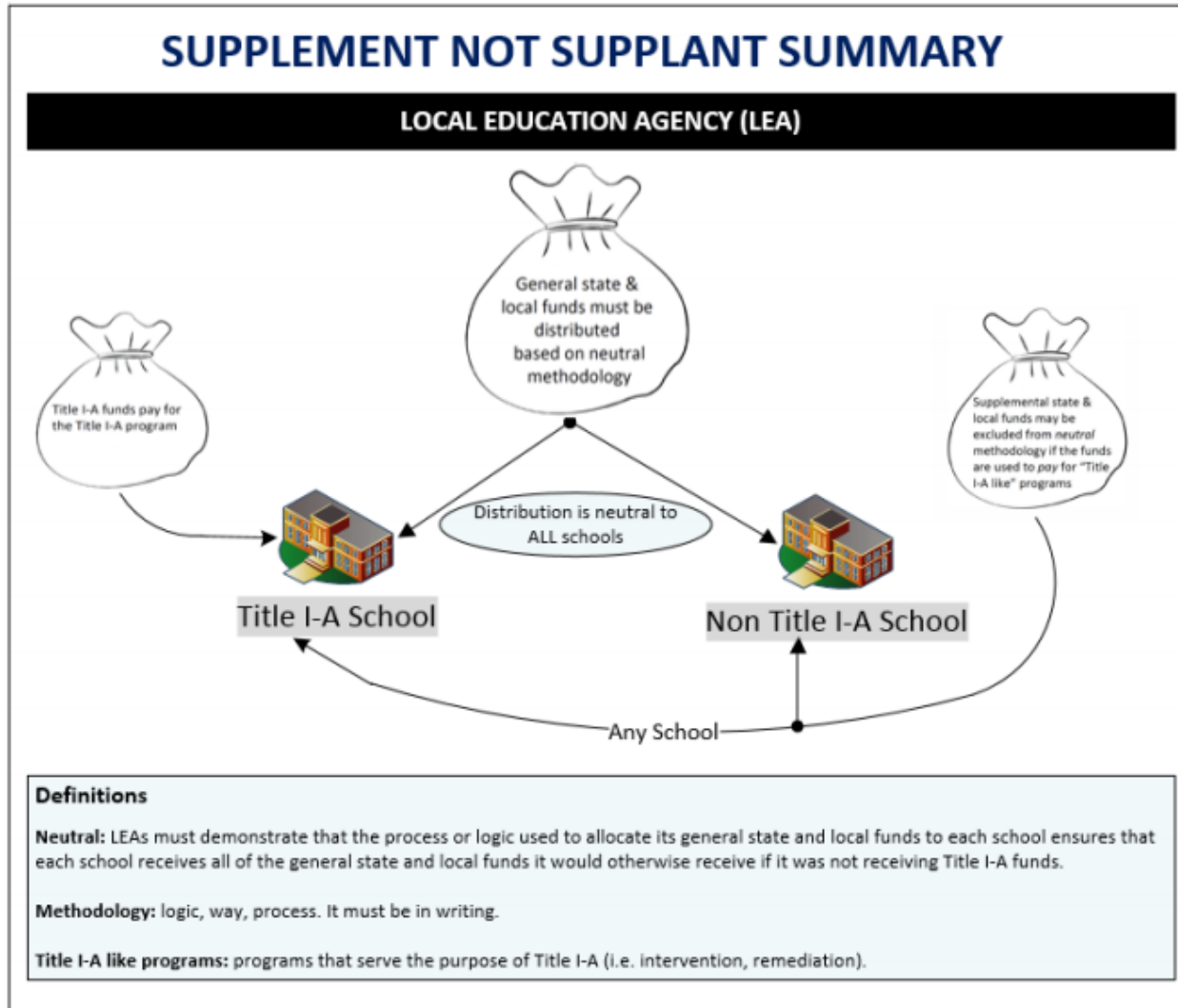
## SDE SNS Manual

- <https://www.sde.idaho.gov/federal-programs/funding/files/fiscal/allowable/Supplement-not-Supplant-Manual.pdf>

# Supplement Not Supplant - Methodology



## SNS METHODOLOGY CHART



- LEAs must demonstrate that the methodology used to allocate state and local funds to each school receiving Title I-A funds ensures that each school receives all of the state and local funds it would otherwise receive if it were not receiving Title I-A funds.
- The State Department of Education (SDE) cannot prescribe a particular methodology (process, method, logic, etc.).
- No approval by the SDE.

# Supplement Not Supplant – Methodology (1)



- SNS is an annual process to demonstrate compliance.
- Demonstration of compliance occurs only once during the year.
- No requirement to adjust state and local allocations when changes occur during the school year.

# Supplement Not Supplant – Methodology (2)



- Various methodology to establish compliance are allowed.
- But must be neutral.
- Methodologies can be based on grade span.
- Can be different for charter schools.
- Vary based on student enrollment.
- Additional funding based on high needs (additional support).

# Supplement Not Supplant – Exceptions



- Exclusion of state and local funds used for programs that meet intent and purpose of Title I-A.
- Single schools are not required to meet SNS.
- LEAs with only Title I schools are not required to meet SNS.
- Grade span that contains only single school, non-Title I schools or Title schools are not required to meet SNS.



# Supplement Not Supplant – Funding Changes



- Last minute changes...
  - In the reallocation of resources should not impact compliance.
  - Departing employee may be replaced as long as Title status is not a factor
  - But if resources are not allocated to building because of its Title status, the building would not be compliant

# Supplement Not Supplant - Allowability



- Not all costs are allowable!
  - Not supplanting does not mean allowability.
  - Cost must be allowable under Title I-A.
  - Costs must be included in schoolwide or targeted assistance plan.
  - Costs must be necessary, reasonable, allocable.

# Supplement Not Supplant - Compliance



- LEA must maintain documentation to demonstrate that the LEA
  - Allocated State and local funds to schools in accordance with its methodology.
  - Complied with program requirements.
  - Facilitates an effective audit.

# Supplement Not Supplant I-A - Example



An LEA does not allocate ***general, state and local funds*** to one of its Title I-A schools because this school already receives enough in federal funds.

This is supplanting because this school did not receive its general, state and local funds it would otherwise receive if it was not receiving Title I-A funds.

# Supplement Not Supplant I-C - Example



- Purchase of a bus or a van to transport all children because some of them might be migratory children.
  - This is supplanting because the LEA would have had to purchase this bus anyway, regardless of Federal funds. If the LEA purchases a vehicle by using Federal funds, it must be used exclusively for purposes of the MEP.
- An LEA used I-C funds to comply with the Civil Rights Act that requires that districts provide information to parents in a language they can understand.
  - Since translating/interpreting is a requirement for all parents who need it, using the migrant family liaison to interpret because the child is in the migrant program is supplanting. The district would have to provide that service anyway, even if the family wasn't migrant.

# Supplement Not Supplant II-A - Example



- Backgrounds check fees or fingerprinting fees if it is required by the State
- Assessment and other fees required by the State

*The only fees or dues that may be funded with Title II-A funds would be associated with memberships that are optional and which would not be paid in the absence of Federal funds.*

# Supplement Not Supplant III-A - Example



- Administer the annual EL assessment used to identify and place students. (Salaries for EL assessment coordinator, EL assessment, assessment, EL testing, EL placing, WIDA, WIDA screener, ACCESS 2.0, W-APT)
- Provide regular core language instruction (English Teacher or English as a second language teacher, general substitute teacher)
- Meet its civil rights obligations to EL students

# Supplement Not Supplant IV-A - Example



- An LEA paid for the cost of activities that would have been paid with State or local funds in the absence of the IV-A program funds
- Example: Standard music class teacher's salary without having a supplemental program.



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